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August 7, 2025

By U.S. Mail and ECF

Mr. Mark B. Busby
Clerk of Court
Office of the Clerk
United States District Court
450 Golden Gate Avenue
San Francisco, CA 94102-3489

Re: Screening of Garrett Donnelly

Dear Mr. Busby:

Pursuant to Rule 1.12 of the California Rules of Professional Conduct, I write to advise the Court and relevant parties of the following:

Garrett Donnelly, who served as a judicial law clerk to the Honorable Yvonne Gonzalez Rogers of the United States District Court for the Northern District of California from January 2024 to March 2025, is now a law clerk of this firm. In light of his former employment, and to comply with the requirements of Rule 1.12 of the California Rules of Professional Conduct, we hereby make the following disclosure.

Covington & Burling LLP has been retained to represent Meta Platforms, Inc., and subsidiaries and affiliates against various lawsuits or claims threatened by State Attorneys General, individual plaintiffs, and school districts and local government or tribal entities, challenging the Instagram and Facebook apps as addictive to teens primarily on theories of product liability, negligence, public nuisance, and consumer protection violations; and in litigation over insurance coverage for the above matters (the “Meta Matters”). We understand that Mr. Donnelly participated in the multi-district litigation captioned *In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047, during his judicial clerkship. Accordingly, we have undertaken to screen him from any participation in the Meta Matters. The following steps have been taken:

(a) Mr. Donnelly will not participate in any way in the Meta Matters and will not share in any fees derived from the Meta Matters;

(b) All employees of the firm have received written notification of Mr. Donnelly’s disqualification from the Meta Matters;

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(c) All employees have been advised in that written notification that any attempt, direct or indirect, to obtain assistance from Mr. Donnelly in connection with the matter is strictly prohibited and that they may not discuss the Meta Matters with him or in his presence or pose hypothetical questions to him based on the facts of the Meta Matters, or otherwise seek to utilize his experience regarding the Meta Matters; and

(d) All employees have been instructed in that written notification to take all reasonable steps to assure that Mr. Donnelly is denied access to any and all documents and files, including computerized documents and files, related to the Meta Matters.

These screening procedures are part of the standard policies and procedures of this firm.

If you have any questions regarding this matter, please do not hesitate to call me at 415-591-7021.

Respectfully submitted,

s/ Jeffrey M. Davidson

Jeffrey M. Davidson

cc: Counsel of Record in *In re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation*, MDL No. 3047 (by ECF)